

EXHIBIT C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

Civil Action No. 19-cv-03377-LAP

ALAN DERSHOWITZ,

Defendant.

ALAN DERSHOWITZ,

Counterclaim Plaintiff,

v.

VIRGINIA L. GIUFFRE,

Counterclaim Defendant.

**PLAINTIFF VIRGINIA GIUFFRE'S SECOND SET OF INERROGATORIES
PROPOUNDED TO DEFENDANT ALAN DERSHOWITZ**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff and Counterclaim Defendant Virginia L. Giuffre ("Giuffre") requests that Defendant and Counterclaim Plaintiff Alan Dershowitz ("Dershowitz") answer each of the following Interrogatories fully, in writing and under oath, within thirty (30) days after service hereof.

DEFINITIONS

The words and phrases used in these Interrogatories shall have the meaning ascribed to them under the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, including Local Rules of Civil Procedure 26.3 definitions for "communication," "document," "identify," "parties," "person," and

“concerning.” The Definitions expressly include hard copy documents and electronically stored information—including writings, drawings, graphs, charts, photographs, sound recordings, imagines, and other data or data compilations. Giuffre expressly requests forensic imagines of all electronically stored information (i.e., the document and data, metadata, etc.). Definitions also expressly include tangible things.

In addition, the following terms shall have the meanings set forth below whenever used in any Interrogatory. The following Definitions apply to the Instructions and Interrogatories below and are incorporated into each Instruction and Interrogatory as if fully set forth therein:

1. “Action” means the lawsuit captioned *Virginia L. Giuffre v. Alan Dershowitz*, Civil Action No. 19-cv-03377-LAP.
2. “You,” “Your,” and Dershowitz mean Alan Dershowitz, inclusive of any agents, representatives, business entities controlled by you including but not limited to “Alan Dershowitz Consulting, LLC,” all persons acting on Your behalf, and any and all other persons associated with, affiliated with, or controlled by You.
3. “Giuffre” means Plaintiff and Counterclaim Defendant Virginia L. Giuffre (nee Roberts).
4. “Complaint” means the Amended Complaint filed by Giuffre in the Action.
5. “ESI” means electronically stored information as defined by and used in the Federal Rules of Civil Procedure.
6. The word “including” shall have its ordinary meaning and shall mean “including but not limited to” and shall not indicate limitation to the examples or items mentioned.

7. The terms "refer" and "relate to"—or any tense or combination of those words or phrases—mean reflecting, referring to, relating to, regarding, discussing, concerning, constituting, mentioning, pertaining to, alluding to, or associated with.

8. The singular of each word shall be construed to include its plural and vice versa, and the root word and all derivations (i.e., "ing," "ed," etc.) shall be construed to include each other.

9. As used herein the singular form of a noun or pronoun shall be considered to include within its meaning the plural form of the noun or pronoun so used, and vice versa; and the use of any tense of verb shall be considered to include within its meaning all other tenses of the verb so used.

10. The "information," "possession," "custody," and "control" of a person shall be construed to include such person's agents, representatives, and attorneys.

INSTRUCTIONS

1. If You cannot answer any of these Interrogatories in full, answer to the extent possible, specify the reasons for Your inability to answer the remainder, and state whatever information, knowledge or belief You do have concerning the unanswered portion.

2. In answering these Interrogatories, You should provide not only all information in your possession, custody, or control, but also all information which is reasonably available to You.

3. To the extent that any information, in whatever form that is responsive to the Interrogatories below has been destroyed, lost, or misplaced, please identify that information by type and author and the date and manner in which the information was destroyed, lost or misplaced.

4. If you claim any privilege or similar basis for not answering any of these Interrogatories in whole or in part, please provide a privilege log consistent with Local Rule 26.2.

5. Plaintiff specifically requests that You supplement Your answers to these Interrogatories as required under Fed. R. Civ. P. 26(e).

INTERROGATORIES

1. Identify, as that term is used in Local Rule 26(c)(3), all individuals you contend have knowledge about any of the claims, counterclaims, or defenses in this Action, including but not limited to, any individuals you contend have information that could be used to impeach Plaintiff Virginia Giuffre and provide a description of the subject matter(s) and specific topic(s) each such individually allegedly has knowledge about.

2. Identify, as that term is used in Local Rule 26(c)(3), all individuals you may call as a witness at trial, including but not limited to, any individuals you may call to impeach Plaintiff Virginia Giuffre and provide a description of the subject matter(s) and specific topic(s) each such individually will be testifying about if called as a witness at trial.

3. Identify, as that term is used in Local Rule 26(c)(4), all documents you may use at trial to contradict any statements made by Plaintiff at her deposition or that you contend would otherwise impeach Plaintiff's credibility, including but not limited to, any documents implicitly being referred to by Howard Cooper in his email of April 22, 2022.



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*Admitted PHV

Dated: May 9, 2022

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 9th day of May, 2022, I served the attached document via e-mail to the following counsel of record:

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By: 
Nicole J. Moss